

### **REMARKS**

Reconsideration of the above-identified application in view of the preceding amendments and following remarks is respectfully requested.

Claims 1-25 and 30-32 are pending in this application. By this Amendment, Applicants have cancelled Claims 26-29 without prejudice and amended Claims 1, 11 and 18. New Claims 30-32 have been added by this amendment. It is respectfully submitted that no new matter has been introduced by these amendments, as support therefor is found throughout the specification and drawings.

In the Office Action, Claims 26-29 were rejected. However, Claims 26-29 have been cancelled and the rejections thereto obviated. Accordingly, these rejections are not further addressed and withdrawal of the rejections is respectfully requested.

In the Office Action, Claims 1, 4, 8, 11, 14, 18, 21, 28 and 29 were rejected under 35 U.S.C. § 103 (a) over U.S. Patent Application Publication No. 2002/0169745 to Hotti et al. in view of U.S. Patent No. 6,363,388 to Sprenger.

Hotti et al. disclose managing a distributed database by managing database schemas and configuration software that uses the schemas. The configuration manager apparatus is external to the database nodes and includes replicas that are scripts used to create and update the schemas of the database (see paragraph 29). The configuration manager apparatus extracts the schema management mechanism from the application's schema and distributes new and modified schema and software configuration scripts to the nodes of the system (see paragraphs 33-35). The application runs these scripts to update the application replica schema (see paragraph 74).

Sprenger discloses an application that examines the contents of a project table to

verify validity of the data.

In contrast to the disclosure of Hotti et al., amended Claim 1 recites, *inter alia*, a program product having computer-readable instructions to perform steps including (a) receiving user specified database schema files for release to a list of corresponding database servers where modifications are to occur, wherein each schema file includes proposed database object structures. Hotti et al. do not disclose such steps but rather includes scripts to update the application replica schema as noted above.

Amended Claim 1 also includes (c) verifying that the user has proper permissions to modify the database object structures, wherein the proper permissions are controlled by a permissions file that specifies which users have permissions to release each database object structures and the database servers that the respective database object structures are released to. Neither Hotti et al. nor Sprenger disclose such steps.

Further amended Claim 1 includes (d) comparing existing database object structures to the proposed database object structures to determine if the existing database object structures need to be modified and (e) if the existing database object structures need to be modified, then, i) automatically generating and executing the appropriate commands based on the comparison to modify the existing database object structures. The Examiner incorrectly asserts that “comparing” is inherent in the process of synchronizing. As disclosed in Hotti et al., synchronizing merely means inserting new information in the node so that the node is brought up to date. No comparison is contemplated but rather a simple replacement. In Hotti et al., no comparison is performed, needed or suggested. In contrast, the invention of Claim 1 compares to determine if further action is necessary and, if so, automatic generation and execution of the appropriate commands occurs. Thus, the

commands are fine tuned to go from the original configuration to the current configuration. Hotti et al. does not disclose or suggest such method steps of comparing and automatically generating appropriate commands based on the comparison.

Amended Claim 1 also recites ii) checking that the database servers being modified are within a respective release time, iii) automatically generating identification files to identify the database servers that are being managed and an entire set of database object structures being managed, wherein the identification files include release permission information for each database object that specify the users who are able to release changes to each database object, the database servers to which those changes are released and specified times when changes are made to each database server while access to the identification files is limited to administrators, iv) automatically parsing the valid DDL commands in a schema file to determine the database object structure that a respective database object should have on a database server by database server basis, v) automatically issuing commands to modify the database object structure of the respective database object on the respective database server so the database object structure matches the database object structure that is represented in the respective schema file and vi) verifying that the database objects were modified properly such that if any errors occur during a structure change, an original structure of the database object is restored on the respective database server by renaming the original database object by appending a respective object name to an identifier as a backup and renaming the backup back to the original respective object name when an error occurs related to such database object. As a result, the database schema matches the files in CVS. Also, alter table statements no longer need to be written. Hotti et al. does not disclose or suggest such method steps or

recognize such advantages.

Still further, amended Claim 1 recites (f) automatically creating release notes, based on the identification files, wherein the release notes are generated on a periodic basis and include documentation related to modifications of the database object structures, and (h) automatically sending the release notes to a plurality of predefined addresses so that users associated with the predefined addresses view a history of where the database objects came from. Hotti et al. merely teaches logging, which is simple tracking of activity that occurs. In contrast, the release notes of Claim 1 are automatically generated and based on the identification files to document the modifications such that the history can be reviewed. Such details are not taught or suggested by Hotti et al.

Additionally, amended Claim 1 also recites (g) automatically releasing permissions files. Hotti et al. does not disclose or suggest such a method step.

It is respectfully submitted that Sprenger does not overcome the deficiencies of Hotti et al. noted above, assuming for the sake of argument that the combination is proper, which Applicant's representatives asserts that it is not.

The Examiner took Official Notice that verifying validity of data and verifying access permissions are notoriously well known in the prior art. The applicant hereby seasonably traverses such Official Notice and requests evidence in support of same in the event that the rejections are maintained.

Claims 11 and 18 have been amended and are commensurate in scope with Claim 1. Accordingly, Claims 11 and 18 are also allowable for at least the same reasons as Claim 1.

In view of the above, Claims 1, 4, 8, 11, 14, 18 and 21 of the subject

application are not rendered obvious by the combination of references cited by the Examiner, and withdrawal of the rejection under 35 U.S.C. §103(a) is respectfully requested.

In the Office Action, Claims 2, 12 and 19 were rejected under 35 U.S.C. § 103 (a) over Hotti et al. in view of Sprenger and further in view of Sakamoto.

It is respectfully submitted that Sakamoto does not cure the deficiencies noted above. Thus, Claims 2, 12 and 19 are patentable for the same reasons. Further, the Examiner simply has incorrectly plucked a small portion of Sakamoto out of context to form an argument rather than properly considering the invention as a whole. When considering the invention as a whole, all the limitations plus having the computer network further perform the step of checking that each database server that has a structure modified has the modification occur during a prescribed release time is not obvious.

Therefore, Claims 2, 12 and 19 are not rendered obvious by the combination of references cited by the Examiner, and withdrawal of the rejection under 35 U.S.C. §103 (a) is respectfully requested.

In the Office Action, Claims 3, 6, 13, 16, 20 and 23 were rejected under 35 U.S.C. § 103 (a) over Hotti et al. in view of Sprenger and further in view of Tabellion et al.

It is respectfully submitted that Tabellion et al. does not cure the deficiencies noted above. Thus, Claims 3, 6, 13, 16, 20 and 23 are patentable for the same reasons, and withdrawal of the rejection under 35 U.S.C. §103 (a) is respectfully requested.

In the Office Action, Claims 5, 15 and 22 were rejected under 35 U.S.C. § 103 (a) over Hotti et al. in view of Sprenger and further in view of Shahabi.

It is respectfully submitted that Shahabi does not cure the deficiencies noted above. Thus, Claims 5, 15 and 22 are patentable for the same reasons. Further, the Examiner simply has incorrectly cited portions of Shahabi out of context to form an argument rather than properly considering the invention as a whole. This also illustrates the lack of motivation, teaching or suggestion to combine these references. When considering the invention as a whole, all the limitations plus bundling the plurality of schema files into a module for simultaneous execution are not obvious nor is the combination proper. Therefore, Claims 5, 15 and 22 are not rendered obvious by the combination of references cited by the Examiner, and withdrawal of the rejection under 35 U.S.C. §103 (a) is respectfully requested.

In the Office Action, Claims 7, 17, 24 and 25 were rejected under 35 U.S.C. § 103 (a) over Hotti et al. in view of Sprenger and further in view of Issacson et al.

It is respectfully submitted that Issacson et al. does not cure the deficiencies noted above. Thus, Claims 7, 17, 24 and 25 are patentable for the same reasons and withdrawal of the rejection under 35 U.S.C. §103 (a) is respectfully requested.

In the Office Action, Claim 9 was rejected under 35 U.S.C. § 103 (a) over Hotti et al. in view of Sprenger and further in view of Wiss et al.

It is respectfully submitted that Wiss et al. does not cure the deficiencies noted above. Turning to the inappropriateness of the combination, the Examiner took Official Notice that the limitations of Claim 9 are notoriously well known in the prior art. The applicant hereby seasonably traverses such Official Notice and requests evidence in support of same in the event that the rejections are maintained. Thus, Claim 9 is patentable for the same reasons and withdrawal of the rejection under 35 U.S.C. §103 (a)

is respectfully requested.

In the Office Action, Claim 10 was rejected under 35 U.S.C. § 103 (a) over Hotti et al. in view of Sprenger and further in view of Wiss et al. and Cleraux et al.


It is respectfully submitted that Cleraux et al. does not cure the deficiencies noted above. Turning to the inappropriateness of the combination, the Examiner took Official Notice that the limitations of Claim 10 are well known in the prior art. The applicant hereby seasonably traverses such Official Notice and requests evidence in support of same in the event that the rejections are maintained. Thus, Claim 10 is patentable for the same reasons and withdrawal of the rejection under 35 U.S.C. §103 (a) is respectfully requested.

Any additional fees or overpayments due as a result of filing the present paper may be applied to Deposit Account No. 04-1105. It is respectfully submitted that all of the claims now remaining in this application are in condition for allowance, and such action is earnestly solicited.

If after reviewing this amendment, the Examiner believes that a telephone interview would facilitate the resolution of any remaining matters the undersigned attorney may be contacted at the number set forth herein below.

Respectfully submitted,

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